

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
Eastern Division

J&J SPORTS PRODUCTIONS, INC.,)

Plaintiff,)

v.)

Case No. 2011-cv-7816

BELINDA E. LOYOLA, indiv. and d/b/a QUEEN)

ALBERT'S DINER & LOUNGE, INC. d/b/a)

QUEEN ALBERT'S DINER AND LOUNGE,)

and QUEEN ALBERT'S DINER & LOUNGE,)

INC. d/b/a QUEEN ALBERT'S DINER AND)

LOUNGE,)

Defendants.)

**PLAINTIFF'S MOTION TO REINSTATE AND ENTER AN ORDER OF
JUDGMENT AGAINST THE DEFENDANTS**

NOW COME the Plaintiff, J&J SPORTS PRODUCTIONS, INC., and respectfully requests that this Court Reinstate this matter against Defendants, BELINDA E. LOYOLA, indiv. and d/b/a QUEEN ALBERT'S DINER & LOUNGE, INC. d/b/a QUEEN ALBERT'S DINER AND LOUNGE, and QUEEN ALBERT'S DINER & LOUNGE, INC. d/b/a QUEEN ALBERT'S DINER AND LOUNGE, and in support thereof, states as follows:

1. That on October 25, 2012, this matter was dismissed without prejudice by this Honorable Court.

2. That a Settlement Agreement was entered into by both parties wherein which the Defendant would pay a total of \$5,000.00 to the Plaintiff. Payments in the amount of \$333.33 were to be made on or before the 15th of each month beginning on May 15, 2013 and continuing through July 15, 2014. See attached Exhibit A.

3. As of the filing of this motion, Defendant has failed to make a single payment towards the agreed settlement.

5. That pursuant to the Settlement Agreement, Defendant currently owes Plaintiff a total amount of \$5,000.00 plus attorney's fees in the amount of Six Hundred and 00/100 (\$600.00). See attached Affidavit Exhibit B.

6. Additionally, pursuant to the Settlement Agreement, Defendants agreed to pay a \$3,000.00 penalty fee should they default in payment. See attached Settlement Agreement.

WHEREFORE, Plaintiff, J&J SPORTS PRODUCTIONS, INC., prays this Honorable Court enter an order to Reinstate this case against Defendants, BELINDA E. LOYOLA, indv. and d/b/a QUEEN ALBERT'S DINER & LOUNGE, INC. d/b/a QUEEN ALBERT'S DINER AND LOUNGE, and QUEEN ALBERT'S DINER & LOUNGE, INC. d/b/a QUEEN ALBERT'S DINER AND LOUNGE, and enter an Order for Judgment in the amount of Five Thousand and 00/100 (\$5,000.00) plus attorney's fees in the amount of Six Hundred and 00/100 (\$600.00) and Three Thousand and 00/100 (\$3,000.00) in penalty fees for a total Judgment in the amount of Eight Thousand Six Hundred and 00/100 (\$8,600.00) and for any additional relief for Plaintiff this Honorable Court deems just.

s/Andre Ordeanu
Andre Ordeanu

CERTIFICATE OF SERVICE

I, Andre Ordeanu, on oath state that a true and correct copy of the Notice of Filing was electronically filed with the Clerk of the Court on October 30, 2013, using the CM/ECF system which will send notification of such filing(s) to all attorneys of record. Under the penalties of perjury, I certify that the above statements set forth herein are true and correct.

s/ Andre Ordeanu
Andre Ordeanu

Zane D. Smith
ZANE D. SMITH & ASSOCIATES, LTD.
415 North LaSalle Street - Suite 501
Chicago, Illinois 60654
(312) 245-0031
(312) 245-0022 - Fax